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January 8, 2007

The Honorable Gregory M. Sleet
United States District Court
844 King Street
Wilmington, Delaware 19801

VIA ELECTRONIC FILING

Re: *Telcordia Technologies, Inc. v. Lucent Technologies, Inc.*,
C.A. No. 04-875-GMS

Telcordia Technologies, Inc. v. Cisco Systems, Inc.,
C.A. No. 04-876-GMS

Dear Judge Sleet:

The purpose of this letter is to inform the Court of joint proposals the parties have agreed upon with the goal of helping to streamline the pre-trial order and trial of the above-captioned cases. The joint proposed final pretrial order is due on February 16, 2007, and the pretrial conference is scheduled for March 15, 2007. We respectfully submit this letter to request guidance from the Court as to whether these proposals are acceptable.

The parties are in agreement that consolidation of these two cases for purposes of trial would be most efficient given that both trials involve the same patents and that the defendants in both actions have submitted joint expert reports as appropriate. Accordingly, unless the Court prefers otherwise, the parties propose to submit a double-captioned joint proposed final pretrial order that contemplates a single consolidated trial of these cases, rather than two largely redundant separate proposed pretrial orders.

The Court has set aside a full six weeks for trial of these cases (from April 16, 2007 through May 25, 2007). Although the parties will be prepared to propose and discuss the length of time needed for trial in greater detail in their joint proposed final pretrial order and during the pretrial conference, at this stage we are pleased to report our consensus that we should not need six weeks for trial – particularly if the Court decides to permit the proposed consolidation. If acceptable to the Court, the parties propose that trial of these cases begin on April 30, 2007, instead of April 16, 2007.

The Honorable Gregory M. Sleet
January 8, 2007
Page 2

The parties also believe that given their respective positions on summary judgment of noninfringement of the '306 patent, it would be most efficient for all concerned to forego trial of '306 patent infringement issues.¹ Accordingly, unless the Court prefers otherwise, the parties propose to exclude '306 patent infringement issues from their joint proposed final pretrial order.

The parties would be grateful for the Court's guidance as soon as comfortably possible as to whether the parties' proposals are acceptable, and we would welcome the opportunity to discuss this issue during a teleconference if Your Honor would find that helpful.

The parties appreciate the Court's consideration of these requests.

Respectfully,

/s/ Steven J. Balick

Steven J. Balick

SJB/dmf
176549.1

cc: Donald R. Dunner, Esquire (via electronic mail)
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¹ Specifically, the parties agree that summary judgment of noninfringement of the '306 patent is appropriate under the Court's construction of that patent. The parties differ with respect to the grounds for that judgment.